

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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SACHA BOTBOL, et al.,

Plaintiffs,

NOTICE OF MOTION

-against-

05 Civ. 1572 (RJS) (JCF)

THE CITY OF NEW YORK, et al.,

Defendants.

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PLEASE TAKE NOTICE that upon the annexed statement of facts pursuant to Rule 56.1 of the Local Civil Rules of this District, the Declaration of Rose M. Weber and the exhibits in support thereof, and upon all the papers and proceedings had herein, as well as upon any and all documents submitted in *McNamara v. City of New York*, 04 Civ. 9216, *Schiller v. City of New York*, 04 Civ. 7922, *Abdell v. City of New York*, 05 Civ. 8453, and *Dudek v. City of New York*, 04 Civ. 10178, the undersigned will move this Court, before the Honorable Richard J. Sullivan, at the United States Courthouse for the Southern District of New York, located at 500 Pearl Street, New York, New York, on a date to be determined by the Court, for summary judgment in favor of plaintiff Aubryn Sidle on her false arrest claims pursuant to Rule 56 of the Federal Rules of Civil Procedure on the grounds that there are no material issues of fact in dispute that warrant a trial, that there was no probable cause for plaintiff's arrest, and that plaintiff is entitled to judgment as a matter of law, and for such other and further relief as the Court may deem just and proper.

Dated: New York, New York
October 3, 2011

_____/s_____
Rose M. Weber (RW 0515)
Attorney for Plaintiffs
225 Broadway, Suite 1607
New York, NY 10007

TO: All RNC counsel (by ECF)